

Exhibit C



April 17, 2018

Alla Lefkowitz
Deputy Director, Affirmative Litigation
Everytown for Gun Safety
132 E. 43rd Street, # 657
New York, NY 10017
Email: alefkowitz@everytown.org

SUBMITTED VIA FOIA ONLINE PORTAL

Office of Information Policy
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Re: FOIA Request Pertaining to Gun Violence Reduction Initiatives

Dear FOIA Officer,

I write on behalf of Everytown for Gun Safety Support Fund (“Everytown”) pursuant to the Freedom of Information Act, 5 U.S.C. § 552, *et seq.*, to request documents in the possession of the **Office of the Attorney General** regarding certain federal government gun violence reduction initiatives.

Please note that I have separately sent similar requests to: (i) the National Institute of Justice; (ii) the DOJ’s Office of Public Affairs; (iii) DOJ’s Office of Legislative Affairs; and (iv) DOJ’s Office of Legal Affairs. This current request **does not** seek documents from those offices. In addition, this request **does not** seek documents that have been published online by any office of the Department of Justice, and are thereby already available to the public.

For purposes of the below requests, the term “representative” include employee, contractor, agent, officer, director, trustee, subsidiary, affiliate, division, lobbyist (registered or unregistered), or attorney.

From January 20, 2017 to the present:

1. All documents and communications referring to the gun violence reduction initiatives announced on January 4, 2016 by the Office of the Press Secretary of the White House and described in “Fact Sheet: New Executive Actions to Reduce Gun Violence and Make our Communities Safer.”¹

¹ Available at <https://obamawhitehouse.archives.gov/the-press-office/2016/01/05/fact-sheet-new-executive-actions-reduce-gun-violence-and-make-our>



From January 1, 2016 to the present:

2. All documents and communications related to the Gun Safety Technology Challenge (the “Challenge”) unveiled by the National Institute of Justice in October 2015, and described on pages 8-10 of the “Report to the President Outlining a Strategy to Expedite Deployment of Gun Safety Technology.”² This request includes documents and communications pertaining to: (i) the status of the Challenge; (ii) applicants and applications submitted to the Challenge; (iii) testing of the technology submitted in the Challenge, including the suspension thereof; and (iv) suspension or termination of the Challenge.
3. All communications pertaining to either (i) smart gun technology (a.k.a “personalized gun” or “user-authorized” technology) or (ii) the “New Executive Actions to Reduce Gun Violence and Make our Communities Safer” announced on January 4, 2016, with any of the following non-governmental entities, or the representatives thereof: the National Rifle Association (“NRA”), the National Rifle Association Institute for Legislative Action (“NRA-ILA”), the National Shooting Sports Foundation (“NSSF”), the Sporting Arms and Ammunition Manufacturers Institute (“SAAMI”), American Outdoor Brands (formerly Smith & Wesson), Armatix, Beretta, BioFire, Glock, Kimber, Kodiak Industries, iGun Technology, Mossberg, Olin, Protobench, Remington Outdoor (formerly Freedom Group), Sig Sauer, Sturm, Ruger & Company, Taurus, and Vista Outdoors.

This request qualifies for a fee waiver because disclosure of the requested documents is in the public interest as these documents are likely to contribute significantly to the public’s understanding of the activities of the federal government with respect to gun policies. This request is not made for a commercial purpose. If the request for a fee waiver is not granted, Everytown is willing to pay the cost of processing this request. Please contact me at the number below if you anticipate that the cost of processing this request will exceed \$250. I would be grateful if you would deliver the materials in electronic format.

FOIA regulations provide that if some parts of records containing the requested information are exempt from mandatory disclosure, then non-exempt materials shall be disclosed after the exempt material has been deleted. See 5 U.S.C. § 552(b); 28 C.F.R. § 16.6. Therefore, if you determine some portion of a record that is responsive to this request is exempt, please provide a copy of all reasonably segregable, non-exempt portions of the record.

² Departments of Justice, Homeland Security, and Defense, Report to the President Outlining a Strategy to Expedite Deployment of Gun Safety Technology (April 2016), available at https://obamawhitehouse.archives.gov/sites/default/files/docs/final_report-smart_gun_report.pdf.



We request that you produce these documents within 20 working days as required by FOIA. Additionally, in accordance with Section 7 of the OPEN Government Act of 2007, Pub. L. No. 110-175, and pursuant to Attorney General Holder's FOIA Memorandum of March 19, 2009, please provide the individualized tracking number associated with this request should the request take longer than ten days to process.

Thank you for prompt attention to this request. Please feel free to contact me at (646) 324 –8365 or alefkowitz@everytown.org if you have questions or require additional information.

Sincerely,

/s/ Alla Lefkowitz

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Please note that I have separately sent similar requests to: (i) the National Institute of Justice; (ii) the DOJ’s Office of Legal Policy; (iii) DOJ’s Office of Legislative Affairs; and (iv) the Office of the Attorney General. This current request **does not** seek documents from those offices. In addition, this request **does not** seek documents that have been published online by any office of the Department of Justice, and are thereby already available to the public.

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